

INFORMATION MEMORANDUM ON PERSONAL DATA PROCESSING

Dear Customers and Business Partners,

This document contains essential information about how we process your personal data. We appreciate your trust in sharing your personal information with us, and we are committed to protecting it to the fullest extent possible. We also aim to be transparent with you, especially regarding how your personal data is processed.

In compliance with European Union legislation, this Information Memorandum has been prepared in accordance with Act No. 110/2019 Coll., on the Processing of Personal Data, as amended, and in particular with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation - GDPR).

This memorandum provides the key information we, as the data controller, are required to disclose. For more detailed principles of personal data processing, please refer to our Privacy Policy available at asktheangel.nl/zasady_ochrany_osobnich_udaju

1. Who is the Data Controller?

The data controller is the entity that determines the purposes and means of processing personal data.

The controller of your personal data shared with us is Global Health Ministries, a.s., with registered office at Želetavská 1525/1, 140 00 Prague 4 - Michle, Company ID No.: 282 00 870, registered in the Commercial Register maintained by the Municipal Court in Prague, Section B, Insert 12954.

For any questions regarding the processing of your personal data, do not hesitate to contact the controller at martin.mikyska@passerinvest.cz or by phone at +420 608 264 391. In all cases, we can also be reached at our postal address: Želetavská 1525/1, 140 00 Prague 4.

2. Who is responsible for Data Protection?

The data protection officer is an experienced individual in the field of personal data protection and ensures compliance with applicable legislation. This person is also the most competent to handle any queries or requests concerning personal data.

The responsible person at the controller is the Project Lead, reachable at martin.mikyska@passerinvest.cz or by phone at +420 221 582 111.

3. What is the Purpose of Processing Personal Data?

The controller processes personal data for:

- a) **Conclusion and performance of contractual obligations between the controller and you. This relationship entails further legal obligations requiring the controller to process personal data.**
- b) **Marketing purposes, to tailor the controller's product and service offerings and related communications to your needs, for which the controller obtains your explicit consent.**
- c) **Protection of its other legitimate interests.**

Providing personal data to the controller is generally a legal and contractual requirement. With regard to marketing purposes, which are not required for fulfilling contractual or legal obligations, your consent is necessary. Refusing to provide consent for marketing purposes does not affect the controller's ability to provide products or services under a contract.

4. What Are Our Legitimate Interests?

The controller also processes personal data to protect its legitimate interests. These include proper performance of contractual obligations, compliance with legal duties, direct marketing, business and property protection, environmental protection, and ensuring sustainable development.

To best protect your privacy, you have the right to object to processing and request that your data be processed only for essential legal reasons or be blocked. More information about your rights can be found in Article 11 of this memorandum.

5. How Was Personal Data Obtained?

Personal data was obtained directly from you, especially through completed forms or mutual communication. Additionally, data may have been sourced from public registers and records such as the Commercial Register, debtor registries, professional directories, or the Land Registry. The controller may also have obtained data from third parties authorized to access and process your data or from social networks and websites where you published such data.

6. What Categories of Personal Data May Be Processed?

To ensure contract performance, legal compliance, and personalized service offerings, the controller processes the following categories of personal data:

- a) Basic identification data – name, surname
- b) Contact information – phone number, email address
- c) Communication data – content of emails, SMS/MMS, call records, or contact forms
- d) Geolocation data from browsers or mobile apps you use

7. What Is the Legal Basis for Processing?

Processing is lawful if it is necessary for contract performance, compliance with legal obligations, protection of the controller's legitimate interests, or based on your consent.

Legality of processing also derives from laws such as:

- Act No. 563/1991 Coll., on Accounting
- Act No. 89/2012 Coll., Civil Code
- Act No. 235/2004 Coll., on Value Added Tax

8. Will Personal Data Be Shared with Third Parties?

We may be legally required to share personal data with public authorities, tax administrators, courts, law enforcement, or financial regulatory bodies. Other disclosures will only occur in accordance with the law or with your consent.

9. Will Personal Data Be Transferred Outside the EU or to International Organizations?

No personal data will be transferred outside the European Union/European Economic Area or to any international organization.

10. How Long Will Personal Data Be Stored?

Personal data processed for marketing purposes will be retained for a maximum of 5 years from the date of collection.

Data will never be stored longer than legally permitted. After the retention period, data will be securely and irreversibly destroyed to prevent misuse.

11. What Are Your Rights Regarding Personal Data and How Can You Exercise Them?

The controller ensures that your data is processed properly and securely. You are entitled to the rights outlined below, which you may exercise with the controller.

How to Exercise Your Rights

You may exercise your rights by contacting the data protection officer as mentioned in Article 2.

All responses and statements regarding your rights are provided free of charge. However, if your request is manifestly unfounded or excessive, especially due to repetition, the controller may charge a reasonable administrative fee.

You will receive a response no later than one month after your request. This deadline may be extended by up to two additional months depending on the complexity and number of requests. You will be informed of any extension.

Right to be informed about processing your personal data

You have the right to request information from the controller as to whether your personal data is being processed. If your personal data is being processed, you have the right to obtain information in particular about the identity and contact details of the controller, its representative and, where applicable, the data protection officer; the purposes of the processing; the categories of personal data concerned; the recipients or categories of recipients of the personal data; any joint controllers; the list of your rights; the possibility to lodge a complaint with the Office for Personal Data Protection; the source of the personal data being processed; and whether there is any automated decision-making and profiling.

If the controller intends to process your personal data for a purpose other than that for which it was collected, it will provide you with information about that other purpose and any other relevant information before such further processing takes place.

The information provided to you under this right is already contained in this memorandum; however, this does not prevent you from requesting it again.

Right of Access

You have the right to request from the controller confirmation as to whether or not your personal data is being processed and, if so, to access information about the purposes of processing; the categories of personal data concerned; the recipients or categories of recipients; the intended retention period for the personal data; your rights (including the right to request rectification or erasure of personal data, restriction of processing, or to object to such processing); the right to lodge a complaint with the Office for Personal Data Protection; the source of the personal data (if not obtained directly from you); the existence of automated decision-making and profiling, including meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for you; and information and safeguards in the case of transfers of personal data to a third country or an international organization.

You also have the right to obtain copies of the personal data undergoing processing. However, this right to obtain a copy must not adversely affect the rights and freedoms of others.

Right to Rectification

If any personal information has changed (e.g., address, phone number), you may request correction. You may also supplement incomplete personal data by providing an additional statement.

Right to Erasure

In certain cases, you may request that your personal data be deleted (e.g., when it is no longer needed). The controller deletes data automatically once it is no longer necessary but you may request deletion at any time. Each request is assessed individually. You will be informed of the result.

Right to Restriction of Processing

The controller processes personal data only to the necessary extent. If you believe your data is being processed beyond the declared purposes, you may request restriction to essential legal grounds or data blocking. Each request is individually assessed and responded to.

Right to Data Portability

If you request that your data be transferred to another controller, the current controller will provide it in a suitable format unless legal or significant obstacles prevent it.

You may also object specifically to automated decision-making or profiling.

Right to Object and Automated Decision-Making

If you believe your data is being processed contrary to data protection laws (e.g., for public or legitimate interest, direct marketing including profiling, or for scientific/historical/statistical purposes), you may request explanation or rectification.

Námítku můžete dále vznést i přímo proti automatizovanému rozhodování a profilování.

Right to Issue a Complaint with the Office for Personal Data Protection

You may contact the supervisory authority at any time: Office for Personal Data Protection, Pplk. Sochora 27, 170 00 Prague 7, www.uoou.cz.

Right to Withdraw Consent

You may withdraw consent to processing at any time by sending notice to the controller's registered office.

12. Is Personal Data Automatically Evaluated?

Yes, personal data is subject to automated evaluation and may be used for profiling or automated decision-making in the context of marketing activities.

Your behavior on the website may be tracked and analyzed, which constitutes a certain interference with your privacy. However, this helps us send you only those offers likely to be of interest to you based on the results of such analysis.